

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OLLIE GREENE, et al,

Plaintiffs,

v.

TOYOTA MOTOR CORPORATION, et al.

Defendants.

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CAUSE NUMBER: 3:11-cv-0207-N

JURY TRIAL DEMANDED

PLAINTIFFS' COUNTER DEPOSITION DESIGNATIONS

Plaintiffs Ollie Greene, Individually and as the surviving parent of Wyndell Greene, Sr., William Greene, as the Administrator of the Estate of Wyndell Greene, Sr. and Marilyn Burdette Hardeman, Individually and as the surviving parent of LaKeysha Greene (collectively hereinafter referred to as "Plaintiffs"), submit their counter designation of deposition testimony:

	Witness	Subject matter	Deposition Cites
1.	Andrew Adams	This witness will provide testimony regarding VGNA.	91:2-14
2.	Charles Bird	This witness will provide testimony regarding VGNA.	71:5-17 79:9-20 95:10-22 100:3 – 101:1
3.	Ryan Earheart	This witness will provide testimony regarding Dolphin Line	Not applicable
4.	Joe Gibson	This witness will provide testimony regarding Dolphin Line.	15:2-18
5.	Gary Hatfield	This witness will provide testimony regarding Dolphin Line.	20:12-17 54:12-15 74:6-18 77:23 – 78:3 79:14 – 80:6

	Witness	Subject matter	Deposition Cites
6.	James Jackson	This witness will provide testimony regarding defendant Strick Trailers, LLC	26:7-19
7.	Frank Katz	This witness will provide testimony regarding defendant Strick Trailers, LLC	59:24 - 61:9 112:22-25
8.	Charles Moody	This witness will provide testimony regarding the May 28, 2010 accident and his role in the incident.	10:16-18 12:18 – 14:3 14:25 – 15:24 16:5-21 24:14 – 25:23 28:5-14 50:7 – 51:19 52:14 – 54:8 55:6-18 62:16 – 64:7 66:19 – 68:14 68:18 – 69:17 83:12 – 85:1 86:17 – 88:20 97:6-10 106:2-15 113:12-21
9.	Gregory Prinzo	This witness will provide testimony regarding VGNA.	9:13-24 40:15-20 71:21 – 72:15

	Witness	Subject matter	Deposition Cites
10.	Daniel Sprinkle	This witness will provide testimony regarding the May 28, 2010 accident and his role in the incident.	5:22 – 6:11 7:14-24 8:10-18 13:8 – 14:18 15:2 – 17:20 18:15 – 19:18 20:2-24 26:2 – 27:16 28:3-20 31:4-23 32:11-20 34:4 – 37:7 37:22 – 39:8 40:18 – 41:6 42:9 – 43:14 44:3-13 44:23 – 45:8 46:20 – 47:25 48:13-17 48:22-23 49:3-24 51:9-11 54:7-15 84:24 – 85:23
11.	Jerry Tarlton	This witness will provide testimony regarding John Fayard Moving & Warehouse	37:17-25

Plaintiffs further reserve the right to call any other witness identified by Defendants in their witness lists, as well as rebuttal witnesses and witnesses whose presence may not be known, or reasonably anticipated, at the time of this submission.

Respectfully Submitted,

/s/ Aubrey "Nick" Pittman

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CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2014, the foregoing pleading was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Aubrey “Nick” Pittman
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